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**ATTORNEYS FOR CTS PROPERTIES, LTD.**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

IN RE:	§ Chapter 11
	§
ERG Intermediate Holdings, L.L.C., <i>et al.</i> , <sup>1</sup>	§ Jointly Administered
	§
Debtors.	§ Case No.: 15-31858-hdh-11

**NOTICE OF APPEARANCE UNDER BANKRUPTCY RULE 9010(b)  
AND REQUEST FOR ALL COPIES PURSUANT TO BANKRUPTCY  
RULE 2002 AND ALL PLEADINGS PURSUANT TO BANKRUPTCY RULE 3017(a)**

**PLEASE TAKE NOTICE** that the undersigned hereby appears as counsel for CTS Properties, Ltd. ("CTS"), pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010, and 11 U.S.C. § 1109(b), requests that copies of any and all notices, pleadings,

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtors' federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (3522); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (7538); and ERG Operating Company, LLC (7946). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statement(s) and plan(s) of reorganization, or other documents, filed or entered in this case, be transmitted to:

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Please take further notice that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, messenger delivery, telephone, facsimile, telegraph, telex or otherwise filed or made with regard to the referenced case and proceedings herein.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of CTS's rights (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs, or recoupments in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Respectfully submitted this 21<sup>st</sup> day of May, 2015.

**HAYNES AND BOONE, LLP**

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**Attorneys for CTS Properties, Ltd.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 21, 2015, a true and correct copy of the foregoing document was served by e-mail upon the parties that receive electronic notice in these cases pursuant to the Court's ECF filing system.

/s/ Jarom Yates

Jarom Yates